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ALBERTSONS, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KESIA GLADNEY,

Plaintiff,

v.

ALBERTSONS, LLC, a Delaware
Company d/b/a ALBERTSONS; DOES I-
V; ROE CORPORATIONS I-X,

Defendants.

CASE NO. 2:20-cv-01653-JAD-BNW

**STIPULATION TO EXTEND DISCOVERY
PLAN AND SCHEDULING ORDER**
(THIRD REQUEST)

**SUBMITTED IN COMPLIANCE WITH LR
26-1(B)**

Defendant, ALBERTSONS, LLC, by and through its undersigned attorneys, LEW BRANDON, JR. ESQ., and SARA PASQUALE, ESQ., of BRANDON | SMERBER LAW FIRM, and Plaintiff, KESIA GLADNEY, by and through PETER M. ANGULO, ESQ. of ANGULO LAW GROUP, that the discovery schedule be extended pursuant to LR 26-4.

I. Discovery Conducted to Date (LR 26-4(a)):

Both parties have submitted their initial NRCP 16.1 disclosures and multiple supplemental disclosures. Both parties have served written discovery requests, to which both parties have served responses. Plaintiff has provided Defendant with requested authorizations, allowing Defendant the ability to request Plaintiff's medical records in this personal injury action. The parties have taken the depositions of Plaintiff, Defendant's NRCP (30)(b)(6) designee, Reddy Ice NRCP

(30)(b)(6) designee and percipient witness Sharon Payton-Peoples. The deposition of percipient witness Lisalyn Jones is scheduled for July 14, 2021.

II. Discovery to be Conducted (LR 26-4(b)):

The only discovery the parties are permitting are the depositions of Plaintiff's medical provider James E. Garber, M.D. and percipient witness James Shaw.

III. The Reasons the Remaining Discovery Cannot Be Completed within the Time Limits Set by the Discovery Plan (LR 26-4(c)):

A brief 30-day extension of the current discovery cutoff is requested for the purpose of coordinating the depositions of Plaintiff's medical provider Dr. Jason Garber and percipient witness James Shaw. Dr. Garber and Mr. Shaw are unable to commit to a deposition date prior to the current discovery cutoff of July 19, 2021, due to scheduling conflicts. Accordingly, additional time will be needed to complete these depositions.

IV. Proposed Schedule for Completing All Remaining Discovery (LR 26-4(d)):

The current discovery deadlines are as follows:

1. Discovery Cutoff (LR 26-1(b)(1)): July 19, 2021

The parties propose extending all discovery deadline by 30-days as follows:

2. Discovery Cutoff (LR 26-1(b)(1)): August 18, 2021

DATED this 6th day of July, 2021.

DATED this 6th day of July, 2021.

ANGULO LAW GROUP

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Order

IT IS SO ORDERED

DATED: 2:05 pm, July 09, 2021



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**